

# ***LEEDS BROWN LAW, P.C.***

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January 24, 2024

**Via ECF**

Honorable Vincent L. Briccetti  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: ***Zachary v. BG Retail, LLC***  
Case No. 7:22-cv-10521-VB

Dear Judge Briccetti:

We represent Plaintiff Tova Zachary and the putative class in the above-referenced action. We write jointly with Defendant BG Retail, LLC to respectfully request a 30-day extension of the parties' time to each submit a letter addressing the impact of *Grant v. Global Aircraft Dispatch, Inc.*, 2024 WL 172900 (2d Dep't Jan. 17, 2024) as it pertains to Defendant's pending motion to dismiss Plaintiffs' Amended Complaint. Your Honor's January 22, 2024 Order directed the parties to submit such letters by January 29, 2024. (ECF Dkt #28).

The parties respectfully submit that this adjournment is necessary to allow for a thorough review and analysis of *Grant*. This is the parties' first request for such relief.

The Court's time and consideration is sincerely appreciated.

Respectfully submitted,

**LEEDS BROWN LAW, P.C.**



Brett R. Cohen